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May 30, 2001

Drew Gilpin
Manager of Environmental Services
Oregon Steel Mills
P.O. box 2760
Portland, Oregon, 97208

RE: **Pre-Remedial Investigation Field Activities Data Report & Historical Investigation Report**
Oregon Steel Mills, Portland, Oregon
ECSI File No. 141

Dear Mr. Gilpin:

Thank you for submitting the *Pre-Remedial Investigation Historical Investigation Report* dated March 21, 2001, and the *Pre-Remedial Investigation Field Activities Data Report* dated February 2, 2001 prepared by Exponent. The Oregon Department of Environmental Quality (DEQ) appreciates OSM efforts to investigate and document historical and current environmental issues at the site. DEQ has reviewed these two documents to assess whether the Oregon Steel Mill (OSM) site may contain source(s) of hazardous substances and potentially complete exposure pathway(s) to the Willamette River. DEQ's comments are presented below.

General Comments

Based on the results of the Pre-Remedial Investigation Assessment (Pre-RI) DEQ has determined that there presently are sources, or potential sources, and pathway(s) for the release of hazardous substances from the facility to the Willamette River. This is based on the environmental concerns identified in the historical investigation information, and the concentrations of metals, PCBs and petroleum-related constituents in the sediment, soil and groundwater samples collected in the Pre-RI sampling.

Action – Based on this determination, Oregon Steel Mill is required to complete a Remedial Investigation (RI) at the site in accordance with the Voluntary Agreement dated June 14, 2000 between DEQ and Oregon Steel. Therefore the next step for the project is the completion and submittal of an RI Proposal.

The Pre-RI Assessment Work Plan (Exponent, 2000) identifies completion of the Pre-RI Assessment Report as the next step in the project. The Work Plan states that OSM will compile the information presented in the Historical Investigation Report and the Pre-RI Field Activities Report into a final Pre-RI Assessment Report following our review of these documents. In order to streamline the project, DEQ requests that this information be incorporated into the RI Proposal

and work plan. It is DEQ's expectation that the RI Proposal and the Historical Information Report will contain the necessary components of a Preliminary Assessment (PA) and will be considered the PA-equivalent document for the public administrative record. It is recommended that DEQ and OSM meet to discuss, the additional PA elements required in the document for the administrative record.

Pre-RI Historical Investigation Report

The following comments focus on completing the Pre-RI Assessment to be a PA-equivalent document. These comments should be incorporated in the RI Proposal and subsequent documents.

General Comments

A. Due to the large size of the OSM site, and different hazardous substances used and located in various portions of the site, DEQ requests that the site be subdivided into smaller manageable areas based upon operational areas (i.e., operable units) for the purposes of the PA and RI. This breakdown of the site will assist with completion of the PA requirements by:

- providing a concise understanding of potential hazardous substance use and their locations. This information will be used to identify the potential compounds of interest (COI) and potential or known release(s) in each area of the site;
- assisting in prioritizing and coordinating investigation of current or potential source areas;
- providing clear documentation of site activities and operations for the public record.

The attached figure is an example of how the site could be divided into operable units based upon the facility information.

Action – Review the proposed operable units and modify as appropriate based upon logical facility operating areas. Detailed maps of each of these areas, or combination of operable units will be needed in the initial stages of the RI Proposal to provide accurate locations of known and potential hazardous substance and source areas (current and historically).

B. The PA requires a broad approach in identifying current and historic hazardous substances, and where they are present at the site, and evaluating the current or potential releases to the environment (Comment #3 DEQ Letter to OSM dated August 9, 2000). A majority of this information is generally presented in the historical investigation report. However, to assist in understanding the potential issues in different portions of this site, this information should be broken down for each operable unit of the site. This list of hazardous substances is used to develop a specific list of COI for each operable unit of the site. The resulting COI list is then further refined throughout the project through either physical testing or written documentation describing the management of the COI.

Action – Potential current and historic hazardous substance releases in each of the operable units of the site need to be identified. The attached table, or equivalent, should be used to

document potential hazardous substances in each operable unit, and any known releases within that unit (table is available electronically). Reference material for hazardous substances at the site should include the Hazardous Substance Information Survey completed by OSM. The attached table should be modified to correspond to any general facility area sub-division changes identified in Comment A followed by the addition of any known release(s) within each operable unit of the site. Fill out the contents of the table (adding any COI as needed) to document the hazardous substance(s) and COI at the site.

Specific Comments

1. Provide a historical summary of the northern portion of the site, (i.e., north of the "oil sump"). Currently no discussion of this portion of the site is presented.

2. Provide a discussion of over water or in water operations and hazardous substances that were historically or, are currently used in these operations.

3. DEQ provided specific guidance on completing Task 4 in the Pre-RI Work Plan (i.e., Summary of Reasons for No Further Action at Selected Areas of the Facility). This guidance is presented in Comment # 4 of the DEQ comment letter dated August 9, 2000. Specifically, the fourth bullet in this comment has not been addressed for any of the known releases reported in the historical investigation. The fourth bullet states:

    - Comparison of available data *(for each release)* to preliminary remedial goals (e.g. EPA Region 9), and ecological benchmark values. *(refer to Specific Comment # 11 for the appropriate screening ecological screening values and water quality criteria.)*

    This bullet should be addressed in the RI Proposal prior to formulation of a site investigation approach.

4. What is the source of the berm material along the top of the riverbank?

5. Table 2, Area ID "C" is labeled as "unknown" on Figure 4. The RCRA report, dated September 30, 1992 shows the location of "C" on Figure 2 as a small shed north of the railroad tracks in the scrap yard area. Please verify this location and update the map, if appropriate.

6. Two pathways were identified as potentially complete for transporting COI to the river, storm water and groundwater discharge. It is assumed that the soil contamination leaching to groundwater pathway is evaluated as part of the groundwater pathway and will be evaluated either through groundwater data or soil leaching data in known or possible source areas.

7. Why do the storm water discharges need pH adjustment control equipment?

8. Update Table 2 and Figure 4 to include all recent spill(s).

9. As discussed during our site visit in January 2001, please provide DEQ with the following documents:

    - Slag Risk Assessment

- Hazardous Waste Determination for floor and roadway sweepings.

Pre-RI Field Activities Data Summary

Specific Comments

1. Do the groundwater sample metal results represent total or dissolved concentrations (i.e. were the samples filtered)? Were the GeoProbe groundwater sample locations developed prior to collecting water samples?

2. The locations of the storm water outfalls on the Figures (small circle) and the sampling locations suggest samples were collected above the outfall discharge location.

   Action - Clarify the location of the samples, or the actual outfall location on the map.

3. DEQ is currently using the following ecological risk-based benchmark screening values for freshwater sediment. For organic compounds these are the lower of MacDonald's Threshold Effects Concentrations (TECs). If a compound is not present on the McDonald TEC list then the NOAA's Threshold Effects Levels (TELs). Ecological benchmark screening values for inorganics (i.e. metals) should use site background information where available. The appropriate groundwater screening values for discharge to the river are DEQ's Water Quality Criteria Summary - Table 20 (OAR 340-41-965) with the use of the federal ambient water quality criteria if a compound is not present on Table 20.

   Action – Please revise the tables to reflect the use of these ecological benchmark screening values.

4. Location of the grab groundwater sample collected from GeoProbe boring B-2 was collected from an interval (14 to 24 feet bgs) below the identified zone of soil contamination in this boring (5 to 15 bgs). Please describe the rationale for the groundwater sample location.

5. What is sample SW0001 shown on the chain-of custody? Is this sample analytical results summarized in a report tables? Please clarify.

DEQ requests that OSM provide a written response to comments 1, 2, 4, and 5. Comment 3 should be incorporated in the RI Proposal and subsequent documents.

Conclusions

DEQ has determination based upon the site information provided that presently there are sources, or potential sources, and pathway(s) for the release of hazardous substances from the facility to the Willamette River and that a RI is required for the site. The next steps in this process includes completing the PA-equivalent document and preparing a RI Proposal. Following your review of DEQ's comments and prior to submitting the final Pre-RI Assessment report I suggest we meet during the week of June 11, 2001 to discuss the project direction and how to efficiently complete the the appropriate PA documentation needs and begin discussing the approach to the RI.

Please feel free to call me with any questions or concerns at (503) 229-5562.

Sincerely,

Rodney G. Struck, R.G.
Project Manager
Voluntary Cleanup/Portland Harbor

Attachment: Table
Figure

cc: ECSI File No. 141
Matt McClincy/DEQ VCPH
Bruce Brody-Heine/DEQ VCPH
David Livermore/E^ponent

Oregon Steel Mill
Development of Hazardous Substance List & Potential Compounds Of Interest (COIs)

Facility Area (a)	Potential or *Known Releases*	Hazardous Substances Used or Generated: Historical	Hazardous Substances Used or Generated: Currently	Potential Compounds Of Interest – TPH: Gasoline (b) related TPH	TPH: Diesel Range TPH	TPH: Oil/Lubricant TPH	PCBs	SVOCs	VOCs: VOC	VOCs: Chlorinated VOCs	Metals (b) – Priority Pollutant Metals: Antimony	Arsenic	Beryllium	Cadmium	Chromium	Copper	Lead	Mercury	Nickel	Selenium	Silver	Thallium	Zinc	Metals (b) – Ancillary Metals: Barium	Cobalt	Manganese	Vanadium	Air Conditioning Refrigerants	Sulfuric Acid	Caustic Soda	Anti-freeze	Calcium Fluoride	Other Compounds?	Existing Analytical Data: (yes /no)	Existing Analytical Data: Data for "All" or "Some" of the COIs	Exceed Risk-Based Screening Criteria: PRG Industrial (yes/no/unknown)	Exceed Risk-Based Screening Criteria: Ecological (yes/no/unknown)	Exceed Risk-Based Screening Criteria: Water Quality Criteria (yes/no/unknown)	Regulatory Status (describe)
1 Northern Storage Area	General Area																																						
	AST Release																																						
	Landfill																																						
2 Plate Rolling & Mill Building and Shipping	General																																						
	Former UST Area																																						
3 Metal Scrap Yard	General																																						
4 Slab Scarfing Facility	General																																						
5 Melt Shop & Electrical Substations	General																																						
	Substations																																						
6 Vehicle Maintenance & Shops	General																																						
7 Surface Processing	General																																						
8 Mosely Shear Area	General																																						
9 Administration Building Area	General																																						
10 Southern Storage Area Water Treatment Facility Utility Area, & Former DRD Pond	General																																						
	DRD Ponds																																						
11 Overwater Operations	General																																						

Notes:
List of COIs from hazardous substance information survey, OSM's Toxic Substance and Hazardous Waste Reduction Policy, and the VCP Agreement.
a) potential Source areas identified (Areas A through P) in the Pre-RI Historical Investigation Report (March 21, 2001 should be specifically listed under the appropriate Facility Area.
b) Gasoline related TPH includes all associated compounds listed in the Risk Based Decision Making Guidance. (such as EDB, EDC, MTBE, lead, etc.)

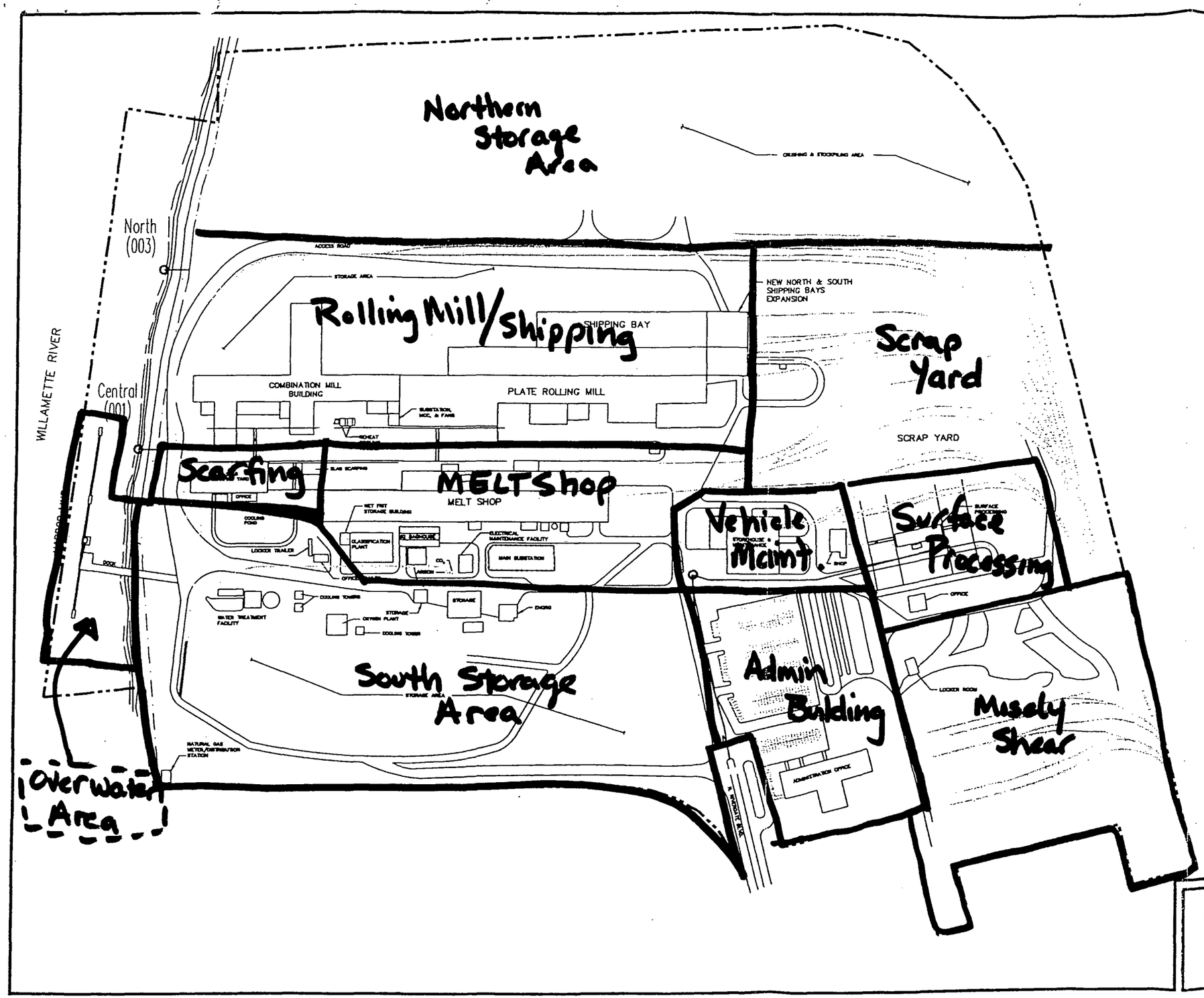

Figure 2. Site map.

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